

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

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In re: : Chapter 11
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ZEN JV, LLC, *et al.*,¹ : Case No. 25-11195 (JKS)
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Debtors. : (Jointly Administered)
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**NOTICE OF AGENDA OF MATTERS SCHEDULED FOR HEARING
ON OCTOBER 7, 2025 AT 1:00 P.M. (ET), BEFORE THE HONORABLE
J. KATE STICKLES, AT THE UNITED STATES BANKRUPTCY
COURT FOR THE DISTRICT OF DELAWARE, 5th FLOOR, COURTROOM 6**

This proceeding will be conducted in-person. All counsel and witnesses are expected to attend unless permitted to appear remotely via Zoom. Please refer to Judge Stickles' Chambers Procedures (<https://www.deb.uscourts.gov/judge-j-kate-stickles>) and the Court's website (<http://www.deb.uscourts.gov/ecourt-appearances>) for information on who may participate remotely, the method of allowed participation (video or audio), Judge Stickles' expectations of remote participants, and the advance registration requirements.

Registration is required by 4:00 p.m. (Prevailing Eastern Time) the business day before the hearing unless otherwise noticed using the eCourtAppearances tool available on the Court's website.

I. RESOLVED MATTER:

1. Second Omnibus Motion of Debtors for Entry of an Order (I) Authorizing the Debtors to Reject Certain Executory Contracts and Unexpired Leases Effective as of the Rejection Date; and (II) Granting Related Relief [[Docket No. 312](#); filed August 22, 2025]

Objection / Response Deadline: September 5, 2025 at 4:00 p.m. (ET)

Objections / Responses Received: None.

¹ The Debtors in these cases, along with the last four digits of each debtor's federal tax identification number (to the extent applicable), are: Zen JV, LLC (0225); Monster Worldwide LLC (6555); FastWeb, LLC; Monster Government Solutions, LLC (5762); Camaro Acquisition, LLC; CareerBuilder, LLC (6495); CareerBuilder Government Solutions, LLC (6426); Lucco Solutions, LLC (4426); CareerBuilder France Holding, LLC (9339); and Military Advantage, LLC (9508). The Debtors' address is 200 N LaSalle Street #900, Chicago, IL 60601.

Related Documents:

- i. Certificate of No Objection Regarding Second Omnibus Motion of Debtors for Entry of an Order (I) Authorizing the Debtors to Reject Certain Executory Contracts and Unexpired Leases Effective as of the Rejection Date; and (II) Granting Related Relief [[Docket No. 342](#); filed September 8, 2025]
- ii. Order (I) Authorizing the Debtors to Reject Certain Executory Contracts and Unexpired Leases Effective as of the Rejection Date; and (II) Granting Related Relief [[Docket No. 353](#); entered September 9, 2025]

Status: On September 9, 2025, the Court entered an order regarding this matter. Accordingly, a hearing on this matter is no longer necessary.

II. CONFIRMATION:

2. Debtors' Second Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Liquidation [[Docket No. 408](#); filed October 3, 2025] (the "**Second Amended Plan**")

Objection / Response Deadline: October 1, 2025 at 12:00 p.m. (ET)

Cure Objection Deadline: October 3, 2025 at 4:00 p.m. (ET)

Objections / Responses Received:

- A. Reservation of Rights of the United States of America Regarding the Debtors' Combined Disclosure Statement and Chapter 11 Plan of Liquidation [[Docket No. 399](#) – filed September 30, 2025]
- B. Informal comments from the Official Committee of Unsecured Creditors
- C. Informal comments from the Chubb Companies
- D. Informal comments from the United States of America
- E. Informal comments from the Texas Comptroller of Public Accounts
- F. Informal comments from the Office of the United States Trustee

Cure Objections / Responses Received:

- A. Informal response from Workday
- B. Informal response from United Healthcare

Related Documents:

- i. Order (A) Conditionally Approving the Combined Plan and Disclosure Statement for Solicitation Purposes Only, (B) Establishing Procedures for Solicitation and Tabulation of Votes to Accept or Reject the Combined Plan and Disclosure Statement, (C) Approving the Forms of Ballots and Solicitation Materials, (D) Establishing Voting Record Date, (E) Fixing the Date, Time and Place for the Confirmation Hearing and the Deadline for Filing Objections Thereto, and (F) Approving Related Notice Procedures [[Docket No. 335](#); entered September 4, 2025] (the “**Conditional Approval Order**”)
- ii. Notice of (I) Conditional Approval of the Combined Plan and Disclosure Statement for Solicitation Purposes Only, (II) Deadline for Casting Votes to Accept or Reject the Combined Plan and Disclosure Statement, and (III) the Hearing to Consider (A) Final Approval of the Combined Plan and Disclosure Statement as Containing Adequate Information and (B) Confirmation of the Combined Plan and Disclosure Statement [[Docket No. 337](#); filed September 4, 2025]
- iii. Notice of Proposed Assumption and Assignment and Cure Amount Relating to Executory Contracts and Unexpired Leases of the Debtors [[Docket No. 382](#); filed September 23, 2025]
- iv. Statement of Official Committee of Unsecured Creditors in Support of Debtors’ Amended Combined Disclosure Statement and Joint Chapter 11 Plan [[Docket No. 387](#); filed September 24, 2025]
- v. Notice of Filing of Plan Supplement in Connection with Debtors’ Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Liquidation [[Docket No. 388](#); filed September 24, 2025]
- vi. Proof of Publication [[Docket No. 405](#); filed October 1, 2025]
- vii. Notice of Filing of Debtors’ Second Amended Combined Disclosure Statement and Joint Plan of Liquidation [[Docket No. 409](#); filed October 3, 2025]
- viii. Notice of Filing of Proposed Confirmation Order [[Docket No. 410](#); filed October 3, 2025]
- ix. Declaration of Jeriad R. Paul Regarding the Solicitation and Tabulation of Votes on the Debtors’ Second Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Liquidation [[Docket No. 411](#); filed October 3, 2025]

Status: In accordance with the Conditional Approval Order, the Debtors intend to file a brief and another declaration in support of confirmation of the Second Amended Plan on Monday, October 6, 2025. The Debtors believe that all reservations of rights and informal comments with respect to confirmation of the Second Amended Plan have been resolved. The hearing on this matter is going forward on an uncontested basis.

Dated: October 3, 2025
Wilmington, Delaware

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